

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
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ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Re: Docket Nos. 306, 327, 331, & 332

**CERTIFICATION OF COUNSEL REGARDING FURTHER REVISED ORDER  
(A) CONDITIONALLY APPROVING THE COMBINED PLAN AND DISCLOSURE  
STATEMENT FOR SOLICITATION PURPOSES ONLY, (B) ESTABLISHING  
PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES TO ACCEPT  
OR REJECT THE COMBINED PLAN AND DISCLOSURE STATEMENT,  
(C) APPROVING THE FORMS OF BALLOTS AND SOLICITATION MATERIALS,  
(D) ESTABLISHING VOTING RECORD DATE, (E) FIXING THE DATE, TIME AND  
PLACE FOR THE CONFIRMATION HEARING AND THE DEADLINE FOR FILING  
OBJECTIONS THERETO, AND (F) APPROVING RELATED NOTICE PROCEDURES**

The undersigned hereby certifies as follows:

1. On June 26, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), filed the *Motion of Debtors for Entry of Order (A) Conditionally Approving the Combined Plan and Disclosure Statement for Solicitation Purposes Only, (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, (C) Approving the Forms of Ballots and Solicitation Materials, (D) Establishing Voting Record Date, (E) Fixing the Date, Time and Place for the Confirmation Hearing and the Deadline for Filing*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

*Objections Thereto, and (F) Approving Related Notice Procedures* [Docket No. 306] (the “**Solicitation Procedures Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Solicitation Procedures Motion as **Exhibit 1** was a proposed form of order (the “**Proposed Solicitation Procedures Order**”) granting the relief requested in the Solicitation Procedures Motion.

2. On September 2, 2025, the Debtors filed the revised version of the Proposed Solicitation Procedures Order (the “**Revised Solicitation Procedures Order**”) [Docket No.327].

3. On September 3, 2025, the Court held a hearing (the “**Hearing**”) to consider, among other things, the relief requested in the Revised Solicitation Procedures Motion. At the Hearing, the Court indicated that it would enter the Revised Solicitation Procedures Order, subject to certain revisions being made consistent with the record made at the Hearing.

4. Consistent with the record made at the Hearing, the Debtors prepared a further revised version of the Revised Solicitation Procedures Order (the “**Further Revised Solicitation Procedures Order**”) and filed the Further Revised Solicitation Procedures Order under certification of counsel [Docket No. 332]. Attached to the certification of counsel was a copy of the Further Revised Solicitation Procedures Order as **Exhibit 1**. For the convenience of the Court and all parties in interest, a blackline comparison of the Further Revised Solicitation Procedures Order marked against the Revised Solicitation Procedures Order was attached thereto as **Exhibit 2**.

5. On September 3, 2025, the Court entered the Further Revised Solicitation Procedures Order [D.I. 332]; however, an exhibit to the Further Revised Solicitation Procedures Order was unintentionally omitted from the Further Revised Solicitation Procedures Order that was entered. At the direction of the Court, the Debtors hereby file this certification of counsel and

respectfully request that the Court reenter the Further Revised Solicitation Procedures Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.<sup>2</sup>

Dated: September 4, 2025  
Wilmington, Delaware

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<sup>2</sup> For the avoidance of doubt, no changes were made to the Further Revised Solicitation Procedures Order or its exhibits.